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Attorneys for Defendant
Otto Trucking LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANT OTTO TRUCKING'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
OPPOSITION TO PLAINTIFF WAYMO
LLC'S MOTION FOR ORDER TO SHOW
CAUSE**

Courtroom: 8, 19th Floor
Judge: Hon. William H. Alsup

Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Otto Trucking LLC (“Otto Trucking”) submits this motion for an order to file under seal their Opposition to Waymo’s Motion for Order to Show Cause (the “Opposition”). Specifically, Otto Trucking requests an order granting leave to file under seal the confidential portions of the following document:

Document	Portions to Be Filed Under Seal
Otto Trucking’s Opposition	Highlighted Portions
Exhibits 1, 2 to the Declaration of Neel Chatterjee	Entire Documents

The highlighted portions of the Opposition include highly confidential, sensitive business information relating to the terms of Otto Trucking’s agreements and corporate structure. This highly confidential information is not publicly known, and its confidentiality is strictly maintained. If this information were made public, Otto Trucking’s competitors and counterparties would have insight into how Otto Trucking structures its business agreements, allowing them to modify their own business strategy. Otto Trucking’s competitive standing could be significantly harmed.

Exhibits 1 and 2 contain highly confidential, sensitive business information of Otto Trucking relating to terms of Otto Trucking’s agreements, corporate structure, and financial information. This highly confidential information is not publicly known, and its confidentiality is strictly maintained. If this information were made public, Otto Trucking’s competitors and counterparties would have insight into how Otto Trucking structures its business agreements, allowing them to modify their own business strategy. Otto Trucking’s competitive standing could be significantly harmed.

Otto Trucking’s request to seal is narrowly tailored to those portions of the Opposition and supporting documents that merit sealing.

1 Dated: July 5, 2017

Respectfully submitted,

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3 By: /s/ Neel Chatterjee

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on July 5, 2017. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed this 5th day of July 2017 in Menlo Park, California.

/s/ Neel Chatterjee
Neel Chatterjee